

# **Exhibit 17**

## **New Jersey Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**New Jersey – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 5, 2024 to the New Jersey (i) Department of Children and Families, (ii) Department of Education, (iii) Department of Health, (iv) Department of Human Services, (v) Department of the Treasury, Office of Budget & Management, (vi) Governor’s Council on Mental Health Stigma, (vii) Secretary of Higher Education, and (viii) Governor’s Office.

At a high level, Meta’s proposal involves using search combinations that require a “Social Media Term” or “Harm Term” to occur “within 150” as one of the following “Youth Terms”:

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR “under-age” OR juvenile\* OR “pre-teen\*” OR preteen\* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen\* z” OR “gen-z” OR “gen\* alpha” OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

Meta also proposed a limited search string to capture documents related to youth social media policy initiatives.

#	Social Media Terms
1	“Youth Terms” w/150 (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
	Harm Terms
2	“Youth Terms” w/150 (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	“Youth Terms” w/150 (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4	“Youth Terms” w/150 (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)

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5	“Youth Terms” <b>w/150</b> (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	“Youth Terms” <b>w/150</b> (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	“Youth Terms” <b>w/150</b> (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	“Youth Terms” <b>w/150</b> (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	“Youth Terms” <b>w/150</b> (negative w/3 (appearance OR experience OR affect* OR effect*))
10	“Youth Terms” <b>w/150</b> (compar* w/5 (appearance OR social OR other* OR negative))
11	“Youth Terms” <b>w/150</b> (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” <b>w/150</b> (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” <b>w/150</b> (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc”)
14	“Youth Terms” <b>w/150</b> (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
	<b>Youth Social Media Policy Initiatives</b>
15	(teen* OR adolescen* OR youth* OR minor* OR young* OR child*) <b>AND</b> (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta”) <b>AND</b> (polic* OR initiative* OR legislat* OR investigat* OR deceptive OR decei* OR fraud* OR misrepresent*)

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below for the Department of Children and Families, Department of Education, Department of Human Services, and Governor’s Council on Mental Health Stigma, and Secretary of Higher Education. Custodians designated with an asterisk (\*) have been affirmatively proposed and/or agreed to by the New Jersey AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

The New Jersey Attorney General’s Office has not proposed custodians for the Department of Health, Department of the Treasury, Office of Budget & Management, or Governor’s Office, nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for those agencies. Accordingly, Meta requests that the Court require those three agencies to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

Agency	Custodian	Title
Dept. of Children and Families	Brian C. Ross*	Assistant Commissioner for Legal, Regulatory and Legislative Affairs
Dept. of Children and Families	Amanda O’Reilly*	Assistant Commissioner, Analytics and Systems Improvement
Dept. of Children and Families	Nicole Brossoie*	Chief of Staff
Dept. of Children and Families	Steven Dodson*	Chief Financial Officer
Dept. of Children and Families	Mollie Greene*	Asst. Commissioner of Div. of Children’s System of Care
Dept. of Children and Families	Laura Jamet*	Asst. Commissioner of Div. of Child Protection and Permanency

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Children and Families	Sanford Starr*	Asst. Commissioner of Div. of Family and Community Partnerships
Dept. of Children and Families	Helen Walker*	Director of Office of Advocacy
Dept. of Children and Families	Kelly Michalowski*	Director of Office of Education
Dept. of Children and Families	Katie Bourgault*	Director of Office of Family Voice
Dept. of Education	Sam Price*	Commissioner
Dept. of Education	Jennifer Killough-Herrara*	Director
Dept. of Education	Kevin Dehmer	Acting Commissioner
Dept. of Education	Kathleen Ehling	Asst. Commissioner for Division of Educational Services
Dept. of Education	<i>Custodians within the Office of Student Support Services</i>	
Dept. of Education	<i>Custodians within the Office of Legislative Affairs / Policy Development</i>	
Dept. of Human Services	Michael Wilson*	Deputy Commissioner of Social Services
Dept. of Human Services	Natasha Johnson*	Assistant Commissioner, Division of Family Development
Dept. of Human Services	Peri Nearon*	Executive Director, Division of Disability Services
Dept. of Human Services	Bernice Davis*	Executive Director, Commission for the Blind and Visually Impaired
Dept. of Human Services	Justin Rodriguez*	Deputy Chief of Staff, Office of Legislative Affairs & Policy
Dept. of Human Services	Michael Young*	Director, Office of Constituent Relations & Community Outreach

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Human Services	Valerie Mielke*	Deputy Commissioner of Health Services
Dept. of Human Services	Gregory Woods*	Assistant Commissioner, Division of Medical Assistance and Health Services
Dept. of Human Services	Renee Burawski*	Assistant Commissioner, Division of Mental Health and Addiction Services
Dept. of Human Services	Chuck Colvard*	Office of Research, Evaluation and Special Projects
Dept. of Human Services	Adam Neary*	Director, Office of Boards & Commissions
Dept. of Human Services	Suzanne Borys*	Asst. Div. Director, Division of Medical Assistance and Health Services
Dept. of Human Services	Eva Scott*	Director of Education, Commission for the Blind and Visually Impaired
Governor's Council on Mental Health Stigma	Theresa Wilson*	Office of Treatment and Recovery Supports
Governor's Council on Mental Health Stigma	Enza Balestrieri*	Program Specialist 2
Governor's Council on Mental Health Stigma	Adam Neary*	Director of Appointments, Boards and Commissions
Governor's Council on Mental Health Stigma	Lisa Ciaston	Legal Liason to DMHAS
Governor's Council on Mental Health Stigma	Debra Wentz	Chair

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Agency	Custodian	Title
Office of the Secretary of Higher Education	Eric Taylor*	Director of Licensure

**Search terms based on Meta's November 22 proposal – modified for 20 keyword strings**

<b><i>Youth Use of Social Media</i></b>	
1a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen”) w/25 (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR FB OR IG OR DM* OR “direct message”)
1b.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR FB OR IG OR DM* OR “direct message”)

<b><i>Youth Mental Health / Wellbeing Issues</i></b>	
2a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen”) w/25 (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress*)
2b.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen”) w/25 (antidepress* OR “attention deficit” OR “ADHD” OR “PTSD” OR bipolar OR “BPD” OR insomnia OR therap* OR counsel* OR treatment*)



2c.	<pre>teen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen* alpha")</pre> <pre>w/25</pre> <pre>(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress*)</pre>
2d.	<pre>teen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen* alpha")</pre> <pre>w/25</pre> <pre>(antidepress* OR "attention deficit" OR "ADHD" OR "PTSD" OR bipolar OR "BPD" OR insomnia OR therap* OR counsel* OR treatment*)</pre>
3a.	<pre>teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR "pre-teen*")</pre> <pre>w/25</pre> <pre>("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite)</pre>
3b.	<pre>teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR "pre-teen*")</pre> <pre>w/25</pre> <pre>(dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)</pre>
3c.	<pre>teen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen* alpha")</pre> <pre>w/25</pre> <pre>("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite)</pre>
3d.	<pre>teen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen* alpha")</pre>

	<p>w/25</p> <p>(dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)</p>
4a.	<p>(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”)</p> <p>w/25</p> <p>(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom*)</p>
4b.	<p>(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”)</p> <p>w/25</p> <p>(hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)</p>
4c.	<p>(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”)</p> <p>w/25</p> <p>(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom*)</p>
4d.	<p>(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”)</p> <p>w/25</p> <p>(hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)</p>
5a.	<p>(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”)</p>

	w/25 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat*)
5b.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
5c.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat*)
5d.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (addic* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR “time spent” OR “habit loop” OR “impulse control”)
6b.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25

	(addic* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR “time spent” OR “habit loop” OR “impulse control”)
7.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (compar* w/5 (appearance OR social OR other* OR negative))
11.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”)

	w/25 (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
13b.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (vape* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana)
14b.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (heroin OR crack OR cocaine OR fentanyl OR opiod* OR opiate* OR meth OR methamphetamine OR oxy OR oxycontin)

14c.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
14d.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (vape* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana)
14e.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (heroin OR crack OR cocaine OR fentanyl OR opiod* OR opiate* OR meth OR methamphetamine OR oxy OR oxycontin)
14f.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

#### ***Other Case Issues***

15a.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation)
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15b.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR sanction* OR cancel* OR abandon* OR ban*)
15c.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud*)
15d.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR child* OR underage* OR juvenile* OR “pre-teen*”) w/25 (defraud* OR misrepresent* OR mislead* OR exploit* OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Fraud Act” OR “consumer protection”)
15e.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation)
15f.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25 (advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR sanction* OR cancel* OR abandon* OR ban*)
15g.	(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”) w/25

	(problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud*)
15h.	<pre>(preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen* alpha”)</pre> <pre>w/25</pre> <pre>(defraud* OR misrepresent* OR mislead* OR exploit* OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Fraud Act” OR “consumer protection”)</pre>



New Jersey Custodians:

Department of Children and Families:

- Brian C. Ross, Assistant Commissioner for Legal, Regulatory and Legislative Affairs
- Amanda O'Reilly, Assistant Commissioner, Analytics and Systems Improvement
- Nicole Brossoie, Chief of Staff
- Steven Dodson, Chief Financial Officer
- Mollie Greene – Asst. Commissioner of Div. of Children's System of Care
- Laura Jamet – Asst. Commissioner of Div. of Child Protection and Permanency
- Sanford Starr – Asst. Commissioner of Div. of Family and Community Partnerships
- Helen Walker – Director of Office of Advocacy
- Kelly Michalowski – Director of Office of Education
- Katie Bourgault – Director of Office of Family Voice

Department of Education:

- Sam Price, Assistant Commissioner
- Jennifer Killough-Herrera, Director

Department of Health:

- Jennie Blackney, Program Manager of Family Health Services

For the Rule 45 subpoena, Jennie Blackney, the Program Manager of Family Health Services, pulled the surveys/grants that New Jersey produced to Meta. Unlike the Department's other sections that focus on adults, Family Health Services serves both parents and children. Specifically, Family Health Services administers Primary Care & Rural Health, Community Health and Wellness ("CHW"), Maternal and Child Health, Special Child Health and Early Intervention Services ("SCHEIS"), and Woman, Infants, and Children ("WIC") programs. Agency counsel contacted multiple DOH divisions to discuss the Rule 45 subpoena and identify any other potential responsive material. The Department's programs and services are run independently, so agency counsel reached out to each of the sections to confirm if they had responsive material. This process mirrored how DOH responds to requests made pursuant to the New Jersey Open Public Records Act, N.J.S.A. 47:1A-1 et seq.

Department of Human Services:

- Michael Wilson, Deputy Commissioner of Social Services
- Natasha Johnson, Assistant Commissioner, Division of Family Development
- Peri Nearon, Executive Director, Division of Disability Services
- Bernice Davis, Executive Director, Commission for the Blind and Visually Impaired
- Justin Rodriguez, Deputy Chief of Staff, Office of Legislative Affairs & Policy
- Michael Young, Director, Office of Constituent Relations & Community Outreach
- Valerie Mielke, Deputy Commissioner of Health Services

- Gregory Woods, Assistant Commissioner, Division of Medical Assistance and Health Services
- Renee Burawski, Assistant Commissioner, Division of Mental Health and Addiction Services
- Chuck Colvard, Office of Research, Evaluation and Special Projects
- Adam Neary, Director, Office of Boards & Commissions
- Suzanne Borys, Asst. Div. Director, Division of Medical Assistance and Health Services
- Eva Scott, Director of Education, Commission for the Blind and Visually Impaired

Department of Treasury, Office of Management and Budget:

- Lynn Azarchi, Acting Director, Office of Management and Budget
- Hannah Good, Deputy Director, Office of Management and Budget
- Brian Francz, Senior Analyst, Office of Management and Budget
- Jacqueline Pruiti, Supervisor 3, Office of Management and Budget
- Gina Quinn, Assistant Director, Office of Management and Budget

Governor's Counsel on Mental Health Stigma:

- Theresa Wilson, Manager, Office of Treatment and Recovery Supports (Liasion for the GCMHS)
- Enza Balestrieri, Program Specialist 2 (former Liasion)
- Adam Neary, Director of Appointments, Boards and Commissions

Office of the Secretary of Higher Education:

- Eric Taylor, Director of Licensure